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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

TWIN HARBORS WATERKEEPER,	)	
	)	
Plaintiff,	)	
v.	)	
	)	COMPLAINT
LOCAL MANUFACTURING, INC.	)	
	)	
Defendant.	)	
	)	
	)	

**I. INTRODUCTION**

1. This action is a citizen suit brought under Section 505 of the Clean Water Act (“CWA”) as amended, 33 U.S.C. § 1365. Plaintiff, Twin Harbors Waterkeeper (“Twin Harbors”), seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys’ and expert witnesses’ fees, for Defendant Local Manufacturing Inc.’s (“Local Manufacturing”) repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of its National Pollutant Discharge Elimination System (“NPDES”) permit authorizing certain

1 stormwater discharges of pollutants from Local Manufacturing's Aberdeen, Washington facility  
2 to navigable waters.

## 3 II. JURISDICTION AND VENUE

4 2. The Court has subject matter jurisdiction over Twin Harbors' claims under  
5 Section 505(a) of the CWA, 33 U.S.C. § 1365(a). Sections 309(d) and 505(a) and (d) of the  
6 CWA, 33 U.S.C. §§ 1319(d) and 1365(a) and (d), authorize the relief Twin Harbors requests.

7 3. Under Section 505 (b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), Twin  
8 Harbors notified Local Manufacturing of Local Manufacturing's violations of the CWA and of  
9 Twin Harbors' intent to sue under the CWA by letter, dated July 2, 2021 and postmarked July 2,  
10 2021 (the "Notice Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit  
11 1. The allegations in the Notice Letter are incorporated herein by this reference. In accordance  
12 with section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A) and 40 C.F.R. § 135.2(a)(1),  
13 Twin Harbors notified the Administrator of the United States Environmental Protection Agency  
14 ("EPA"), the Administrator of EPA Region 10, the Director of the Washington Department of  
15 Ecology ("Ecology"), and Local Manufacturing's registered agent of its intent to sue Local  
16 Manufacturing by mailing copies of the Notice Letter to these individuals on July 2, 2021.

17 4. At the time of the filing of this Complaint, more than sixty days have passed since  
18 the Notice Letter and copies thereof were issued in the manner described in the preceding  
19 paragraph.

20 5. The violations complained of in the Notice Letter are continuing and/or are  
21 reasonably likely to re-occur.



1 information about its discharges and pollution controls in a timely manner. The recreational,  
2 scientific, economic, aesthetic, and/or health interest of Twin Harbors and its members have  
3 been, are being, and will be adversely affected by Local Manufacturing's violations of the CWA.  
4 The relief sought in this lawsuit can redress the injuries to these interests.

5 11. Twin Harbors has organizational standing to bring this action. Twin Harbors has  
6 been actively engaged in a variety of educational and advocacy efforts to improve water quality  
7 and to address sources of water quality degradation in the waters of Western Washington,  
8 including Grays Harbor. As detailed herein and in the Notice Letter, Local Manufacturing has  
9 failed to comply with numerous requirements of its NPDES permit including completing  
10 corrective actions, compliance with water quality standards, monitoring, recordkeeping,  
11 reporting, and planning requirements. As a result, Twin Harbors is deprived of information  
12 necessary to properly serve its members by providing information and taking appropriate action  
13 to advance its mission. Twin Harbors' efforts to educate and advocate for greater environmental  
14 protection, and to ensure the success of environmental restoration projects implemented for the  
15 benefit of its members are also obstructed. Finally, Twin Harbors and the public are deprived of  
16 information that influences members of the public to become members of Twin Harbors, thereby  
17 reducing Twin Harbors' membership numbers. Thus, Twin Harbors' organizational interests  
18 have been adversely affected by Local Manufacturing's violations. These injuries are fairly  
19 traceable to Local Manufacturing's violations and are redressable by the Court.

20 12. Local Manufacturing is a corporation authorized to conduct business under the  
21 laws of the State of Washington.

22 13. Local Manufacturing owns and operates a commercial lumber yard located at or  
23 about 2421 Port Industrial Rd, Aberdeen, WA 98520 (referred to herein as the "facility").  
24

#### IV. LEGAL BACKGROUND

14. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. A discharge of a pollutant from a point source to waters of the United States without authorization by a NPDES permit, issued under Section 402 of the CWA, 33 U.S.C. § 1342, is prohibited.

15. The State of Washington has established a federally approved state NPDES program administered by Ecology. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the EPA pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b).

16. Under Section 402 of the CWA, 33 U.S.C. § 1342, Ecology has repeatedly issued Industrial Stormwater General Permits, most recently on November 20, 2019, effective January 1, 2020, and set to expire December 31, 2024 (the “2020 Permit”). The previous permit was issued December 3, 2014, became effective January 2, 2015, and expired December 31, 2019 (the “2015 Permit”). The 2015 Permit and 2020 Permit (collectively, “the Permits”), contain substantially similar requirements and authorize those that obtain coverage thereunder to discharge stormwater associated with industrial activity, a pollutant under the CWA, and other pollutants contained in the stormwater to waters of the United States subject to certain terms and conditions.

17. The Permits impose certain terms and conditions on those covered thereby, including requirements for monitoring and sampling of discharges, reporting and recordkeeping requirements, and restrictions on the quality of stormwater discharges. To reduce and eliminate pollutants in stormwater discharges, the Permits require, among other things, that permittees

1 develop and implement best management practices (“BMPs”) and a Stormwater Pollution  
2 Prevention Plan (“SWPPP”), and apply all known and reasonable methods of prevention,  
3 control, and treatment (“AKART”) to discharges. The specific terms and conditions of the  
4 Permits are described in detail in the Notice Letter, attached hereto as Exhibit 1 and incorporated  
5 herein by this reference.

## 6 V. FACTS

7 18. Ecology granted Local Manufacturing coverage for the facility under the 2015  
8 Permit under Permit Number WAR008725. Ecology granted subsequent coverage under the  
9 2020 Permit under the same permit number, WAR008725.

10 19. Local Manufacturing discharges stormwater and pollutants associated with  
11 industrial activity to Grays Harbor.

12 20. Local Manufacturing’s facility is engaged in industrial activities including wood  
13 products manufacturing and is approximately 14.55 acres. Local Manufacturing’s facility has at  
14 least five points of discharge that leave the facility via stormwater ditches and pipes that  
15 discharge stormwater and other pollutants to Grays Harbor.

16 21. Local Manufacturing has violated and continues to violate the Permits. Local  
17 Manufacturing’s violations of the Permits are set forth in sections I through VII of the Notice  
18 Letter attached hereto as Exhibit 1 and are incorporated herein by this reference. In particular,  
19 and among the other violations described in the Notice Letter, Local Manufacturing has violated  
20 the Permits by failing to comply with water quality standards, failing to comply with AKART  
21 standards, failing to implement BMPs to control water quality, failing to implement corrective  
22 actions, failing to establishing an adequate SWPPP, failing to collect or analyze quarterly  
23 samples, failing to correctly and timely submit accurate and complete Annual Reports, failing to  
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comply with sample timing and frequency, failing comply with visual monitoring requirements, failing to update sampling locations, failing to submit corrected information to Ecology, failing to record information, failing to retain records, and failing to report permit violations.

22. Local Manufacturing discharges stormwater from the facility containing levels of pollutants that exceed the benchmark values established by the Permits, including the days on which Local Manufacturing collected samples with the results identified in Table 1, and is likely to continue discharging comparably unacceptable stormwater:

Table 1: Monitoring Point A Benchmark Exceedances		
Quarter in which sample was collected	Turbidity (Benchmark 25 NTU)	Copper (Benchmark 14 µg/L)
2nd Quarter 2016	64	
4th Quarter 2017	32.5	
1st Quarter 2020	35.1	
3rd Quarter 2020		27.7

23. The stormwater monitoring data provided in Table 1 shows benchmark exceedances included in the stormwater monitoring results that Local Manufacturing submitted to Ecology.

24. The Permits requires Local Manufacturing's monitoring to be representative of discharges from the facility. The stormwater monitoring results that Local Manufacturing routinely submits to Ecology are not representative of the facility's stormwater discharges, as described in detail in section III of the Notice Letter attached hereto as Exhibit 1.

25. Local Manufacturing's stormwater discharges are causing or contributing to violations of water quality standards and therefore violate the Permits. Discharges from Local Manufacturing's facility contribute to the polluted conditions of the waters of the State, including

1 the water quality standards of Grays Harbor. Discharges from Local Manufacturing's facility  
2 contribute to the ecological impacts that result from the pollution of these waters and to Twin  
3 Harbors and its members' injuries resulting therefrom. These requirements and Local  
4 Manufacturing's violations thereof are described in detail in section I of the Notice Letter,  
5 attached hereto as Exhibit 1, and incorporated herein by this reference.

6         26. Local Manufacturing's exceedances of the benchmark values indicate that Local  
7 Manufacturing is failing to apply AKART to its discharges and/or is failing to implement an  
8 adequate SWPPP and BMPs. Local Manufacturing violated and continues to violate the Permits  
9 by not developing, modifying, and/or implementing BMPs in accordance with the requirements  
10 of the Permits, and/or by not applying AKART to discharges from the facility. These  
11 requirements and Local Manufacturing's violations thereof are described in detail in section I.B  
12 and section II of the Notice Letter, attached as Exhibit 1, and incorporated herein by this  
13 reference.

14         27. Local Manufacturing has violated and continues to violate the monitoring  
15 requirements of the Permits. For example, the Permits require Local Manufacturing to sample its  
16 stormwater discharges once during every calendar quarter at each distinct point of discharge  
17 offsite except for substantially identical outfalls. However, Local Manufacturing has failed and  
18 is failing to monitor discharges from discharges near the Contanda Gate and one in the ditch  
19 along Port Industrial Road and multiple additional places where discharges occur; Local  
20 Manufacturing is currently only sampling from one location: Sample Point A, which is not a  
21 properly representative sample. Local Manufacturing failed to collect and analyze stormwater  
22 samples at Monitoring Point A during the third quarter of 2016 for turbidity and in the second  
23 quarter of 2019 for oil sheen; and Local Manufacturing failed to comply with visual monitoring  
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1 requirements. The monitoring and inspection requirements and Local Manufacturing's  
2 violations thereof are described in detail in section III of the Notice Letter, attached hereto as  
3 Exhibit 1, and incorporated herein by this reference.

4       28. Condition S4.B.2.d of the 2020 Permits requires that Local Manufacturing notify  
5 Ecology of any changes or updates to sample locations, discharge points and/or outfalls by  
6 submitting an "Industrial Stormwater General Permit Discharge/Sample Point Update Form" to  
7 Ecology. Local Manufacturing is in violation of this requirement because it never submitted the  
8 Sample Point Update form to Ecology after the March 4, 2020 Ecology inspection report stated  
9 that the current Sample Point A would be replaced by Sample Point C (end of the west ditch  
10 culvert). Local Manufacturing continues to violate this condition because it is listing the sample  
11 point on its DMRs at Sample Point A, but the sample location was moved to Sample Point C  
12 during the March 4, 2020 Ecology inspection report. In addition, Local Manufacturing  
13 submitted an Electronic Submission Cover Letter with an attestation agreed to at signing for each  
14 and every DMR for the last five years that states, "I had the opportunity to review the content or  
15 meaning of the submittal before signing it; and to the best of my knowledge and belief, the  
16 information submitted is true, accurate, and complete. I intend to submit this information as part  
17 of the implementation, oversight, and enforcement of a federal environmental program. I am  
18 aware there are significant penalties for submitting false information, including possible fines  
19 and imprisonment." Local Manufacturing could be subject to significant criminal penalties for  
20 submitting false sample data for this sample point.

21       29. Condition S4.B.1.a of the Permits requires that Local Manufacturing sample the  
22 discharge from each designated location at least once per quarter. Condition S4.B.1.b of the  
23 Permits requires that Local Manufacturing sample the stormwater discharge from the first fall  
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1 storm even each year. “First fall storm event” means the first time on or after October 1 of each  
2 year that precipitation occurs and results in a stormwater discharge. Condition S4.B.1.c of the  
3 Permits requires that Local Manufacturing collect samples within the first 12 hours of  
4 stormwater discharge events. If it is not possible to collect a sample within the first 12 hours of a  
5 stormwater discharge event, the Permittee must collect the sample as soon as practicable after the  
6 first 12 hours and keep documentation with the sampling records explaining why it could not  
7 collect samples within the first 12 hours or if it is unknown. Condition S4.B.1.d of the Permits  
8 requires Local Manufacturing to obtain representative samples. Precipitation data from the last  
9 five years is appended to this Notice of Intent to Sue and identifies these days. Local  
10 Manufacturing’s samples are not representative of the facility as described in detail in section III  
11 in the Notice Letter attached hereto as Exhibit 1.

12 30. Local Manufacturing has not conducted and/or completed the Level One  
13 Corrective Action responses as required by the Permits. These requirements of the Permits and  
14 Local Manufacturing’s violations thereof are described in section IV.A of the Notice Letter,  
15 attached hereto as Exhibit 1, and incorporated herein by this reference.

16 31. Condition S8.B of the Permits require a permittee to undertake a Level One  
17 Corrective Action whenever it exceeds a benchmark value identified in Condition S5.A, Table 2  
18 of the Permits, as well as Condition S5.B and Table 3 of the Permits. A Level One Corrective  
19 Action comprises of conducting an inspection to investigate the cause, review of the SWPPP to  
20 ensure permit compliance, revisions to the SWPPP to include additional operational source  
21 control BMPs with the goal of achieving the applicable benchmark values in future discharges,  
22 signature and certification of the revised SWPPP, summary of the Level One Corrective Action  
23 in the Annual Report, and full implementation of the revised SWPPP as soon as possible, but no  
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1 later than the DMR due date for the quarter the benchmark was exceeded. Condition S8.A of the  
2 2020 Permit requires that the permittee implement any Level One Corrective Action required by  
3 the 2015 Permit.

4 32. Local Manufacturing triggered Level One Corrective Action requirements for  
5 each benchmark range exceedance identified in Table 1 above. Local Manufacturing's failures  
6 to comply with the Level One Corrective Action requirements include the failure to perform the  
7 required review, revision and certification of the SWPPP; perform required implementation of  
8 additional BMPs; and complete the required summarization in the Annual Report each and every  
9 time for the last five years, its quarterly stormwater sampling results were greater than a  
10 benchmark or outside the benchmark range, including the benchmark exceedances listed in Table  
11 1 above. These corrective action requirements and Local Manufacturing's violations thereof are  
12 described in section IV.A of the Notice Letter, attached hereto as Exhibit 1, and are incorporated  
13 herein by this reference.

14 33. Condition G20 of the Permits requires that when Local Manufacturing becomes  
15 aware that it failed to submit any relevant facts in a permit application, or submitted incorrect  
16 information in a permit application or in any report to Ecology, it shall promptly submit such  
17 facts or information. Local Manufacturing has continued to fail to submit the corrected permit  
18 application information to Ecology regarding the receiving water of the discharge from the  
19 facility. These requirements and Local Manufacturing's violations thereof are described in  
20 section III.F of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by  
21 this reference.

22 34. Condition S9.B of the Permits requires Local Manufacturing to submit an  
23 accurate and complete Annual Report to Ecology no later than May 15 of each year. The Annual  
24

1 Report must include corrective action documentation as required in Condition S8.B-D of the  
2 Permits. Local Manufacturing has violated this condition by failing to submit accurate and  
3 complete Annual Reports as required for the years 2015, 2016, 2017, 2018, and 2019. Local  
4 Manufacturing also failed to submit the 2020 Annual Report by the May 15, 2021 deadline.  
5 These requirements and Local Manufacturing's violations thereof are described in section V of  
6 the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

7 35. Local Manufacturing has failed and continues to fail to comply with recording  
8 and record keeping requirements of the Permits. These requirements and Local Manufacturing's  
9 violations thereof are described in section VI of the Notice Letter, attached hereto as Exhibit 1,  
10 and are incorporated herein by this reference.

11 36. Condition S9.E of the Permits requires Local Manufacturing to take certain  
12 actions, including reporting to Ecology, in the event Local Manufacturing is unable to comply  
13 with any terms and conditions of the Permits which may endanger human health or the  
14 environment. Local Manufacturing has failed to comply with these requirements of the Permits  
15 by failing to report and subsequently correct permit violations, including each and every time  
16 Local Manufacturing failed to comply with corrective action requirements as described above in  
17 paragraphs 30-32, each and every time Local Manufacturing failed to sample a stormwater  
18 discharge as described above in paragraph 27, and each and every time Local Manufacturing  
19 discharged stormwater with amounts of pollutants in excess of the Permit benchmarks as  
20 described in paragraphs 22-23 above. These requirements and Local Manufacturing's violations  
21 thereof are described in section VII of the Notice Letter, attached hereto as Exhibit 1, and  
22 incorporated herein by this reference.



1 CWA which occur after those described in Twin Harbors' Notice Letter, but before a final  
2 decision in this action, should be considered continuing violations subject to this Complaint.

3 45. Without the imposition of appropriate civil penalties and the issuance of an  
4 injunction, Local Manufacturing is likely to continue to violate the Permits and the CWA to the  
5 further injury of Twin Harbors, its members, and others.

## 6 **VII. RELIEF REQUESTED**

7 Wherefore, Twin Harbors respectfully requests that this Court grant the following relief:

8 A. Issue a declaratory judgment that Local Manufacturing has violated and continues  
9 to be in violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and  
10 1342;

11 B. Enjoin Local Manufacturing from operating the facility in a manner that results in  
12 further violations of the General Permit and the CWA;

13 C. Order Local Manufacturing to immediately implement a SWPPP that complies  
14 with the 2020 Permit;

15 D. Order Local Manufacturing to allow Twin Harbors to participate in the  
16 development and implementation of Local Manufacturing's SWPPP;

17 E. Order Local Manufacturing to provide Twin Harbors, for a period beginning on  
18 the date of the Court's Order and running for three years after Local Manufacturing achieves  
19 compliance with all of the conditions of the Permits, with copies of all reports and other  
20 documents which Local Manufacturing submits to Ecology regarding Local Manufacturing's  
21 coverage under the Permits at the facility at the time these documents are submitted to Ecology;

22 F. Order Local Manufacturing to take specific actions to remediate the  
23 environmental harm caused by its violations;

1 G. Order Local Manufacturing to pay civil penalties of \$55,800 per day of violation  
2 for each violation committed by Local Manufacturing thereafter, pursuant to Sections 309(d) and  
3 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4;

4 H. Award Twin Harbors its litigation expenses, including reasonable attorneys' and  
5 expert witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d), and any  
6 other applicable authorization; and

7 I. Award such other relief as this Court deems appropriate.

8  
9 RESPECTFULLY SUBMITTED this 7th day of September, 2021

10  
11 By: SMITH & LOWNEY, PLLC  
By: s/Richard A. Smith  
Richard A. Smith, WSBA #21788  
12 By: s/Meredith Crafton  
Meredith Crafton, WSBA #46558  
13 By: s/Savannah Rose  
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## Exhibit 1

**Smith & Lowney, pllc**

2317 East John Street  
Seattle, Washington 98112  
(206) 860-2883, Fax (206) 860-4187

July 2, 2021

**Via Certified Mail - Return Receipt Requested**

Managing Agent  
Local Manufacturing, Inc.  
PO Box 1406  
Aberdeen, WA 98520-0279

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND  
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Twin Harbors Waterkeeper, P.O. Box 751, Cosmopolis, WA 98537, (206) 293-0574. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days' notice of Twin Harbors Waterkeeper's intent to file a citizen suit against Local Manufacturing, Inc. ("Local Manufacturing"), under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Local Manufacturing's National Pollution Discharge Elimination System ("NPDES") permit.

Local Manufacturing was granted coverage under the Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") effective January 2, 2015 and expired on December 31, 2019, under NPDES No. WAR008725 (the "2015 Permit"). Ecology granted Local Manufacturing coverage under the current iteration of the ISGP effective January 1, 2020, set to expire on December 31, 2024 (the "2020 Permit"), which maintains the same permit number: WAR008725.

Local Manufacturing has violated and continues to violate effluent standards and limitations under the CWA (see 33 U.S.C. § 1365(a) and (f)) including the terms and conditions of the 2015 Permit and the 2020 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 2421 Port Industrial Rd., Aberdeen, WA 98520 (the "facility") as described herein, to the Chehalis River and then to Grays Harbor. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Local Manufacturing.

## I. COMPLIANCE WITH APPLICABLE STANDARDS

### A. Compliance with Water Quality Standards

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Local Manufacturing's discharges not cause or contribute to an excursion of Washington State water quality standards.

Local Manufacturing discharges to the Chehalis River by way of a pipe leading under the neighboring Contanda facility, which flows into Grays Harbor. Local Manufacturing discharges stormwater that contains elevated levels of turbidity, copper, zinc, COD, and TSS as indicated in Tables 1, 2, and 3. Moreover, the discharges Local Manufacturing has sampled and reported underrepresent the polluted condition of its facility discharges, as explained below. These discharges cause and/or contribute to violations of water quality standards for turbidity, copper, zinc, COD, and TSS in the Chehalis River and Grays Harbor, and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation and continue to occur. *See* WAC 173-201A-240 (including criteria for copper and zinc); WAC 173-201A-260 (including toxics and aesthetics criteria); WAC 173-201A-610 (use designations for marine waters); WAC 173-201-612 (use designations for marine water including Grays Harbor); WAC 173-201A-210 (including criteria for turbidity); WAC 173-201A-602 (use designations for fresh waters including the Chehalis River); WAC 173-204 Part III (sediment quality standards); and WAC 173-201A-200 (including dissolved oxygen criteria). Precipitation data from that time period is appended to this Notice of Intent to Sue and identifies these days.

<b>Table 1: Monitoring Point A Benchmark Exceedances</b>		
Quarter in which sample was collected	Turbidity (Benchmark: 25 NTU)	Copper (Benchmark: 14 µg/L)
2nd Quarter 2016	64	
4th Quarter 2017	32.5	
1st Quarter 2020	35.1	
3rd Quarter 2020		27.7

4th Quarter 2020	Value known to Local Manufacturing*	
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\*2020 Annual Report shows a turbidity exceedance in the 4th quarter of 2020 that is not reflected in the 4th quarter 2020 DMR

## **B. Compliance with AKART Standards**

Condition S10.C of the Permits requires Local Manufacturing to apply all known and reasonable methods of prevention, control, and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate SWPPP and best management practices (“BMPs”). Local Manufacturing has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Tables 1, 2, and 3 and as described below in this Notice of Intent to Sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Local Manufacturing has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

## **II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS**

Local Manufacturing is in violation of the Permits’ SWPPP provisions as follows:

1. Condition S3.A of the Permits requires Local Manufacturing to develop and implement a SWPPP that contains specified components. Condition S3.A.2 of the 2015 Permit and Condition S3.A.1 of the 2020 Permit require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. Local Manufacturing has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires Local Manufacturing to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. Local Manufacturing has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented, and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection,

implementation, and maintenance of all applicable and appropriate BMPs. *See Stormwater Management Manual for Western Washington*, July 2019, <https://fortress.wa.gov/ecy/ezshare/wq/Permits/Flare/2019SWMMWW/Content/Resources/Docs/ForDownload/2019SWMMWW.pdf>. Local Manufacturing's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Local Manufacturing's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours, and seasonal variations in business hours or in industrial activities as required.

5. Local Manufacturing's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Local Manufacturing's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Local Manufacturing's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the

method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Local Manufacturing's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement mandatory BMPs. Local Manufacturing is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

10. Local Manufacturing's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs. Local Manufacturing fails to include operation source control BMPs in the following categories: good housekeeping (including the definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Local Manufacturing will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit). Some of the BMPs that Local Manufacturing is failing to implement include those documented by the Ecology inspection reports, an Environmental Report Tracking System ("ERTS") report, and photographic evidence including:

- Failure to minimize the exposure of material to stormwater, documented by photographic evidence;
- Failure to prevent accumulated sediment and tire tracks on the pavement, documented by photographic evidence;
- Failure to vacuum sweep paved surfaces with a vacuum sweeper, documented by photographic evidence;
- Failure to inspect and maintain stormwater drainage and source controls, documented by the March 4, 2020 Ecology inspection report and photographic evidence;
- Failure to clean up spills and leaks immediately to prevent the discharge of pollutants, documented by ERTS #663802, Photo 2 in the March 4, 2020 Ecology inspection report, and additional photographic evidence; and

- Failure to prepare and follow a Spill Prevention and Emergency Cleanup Plan as documented by the March 10, 2016 Ecology inspection report, ERTS #663802 and photographic evidence.

11. Local Manufacturing's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers or surface waters and ground waters of the state, including failing to prevent solids from entering the stormwater and discharging off-site.

12. Local Manufacturing's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff.

13. Local Manufacturing's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

14. Local Manufacturing's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

15. Local Manufacturing's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods; and specifies the procedure for submitting the results to Ecology.

### **III. MONITORING AND REPORTING VIOLATIONS**

#### **A. Failure to Collect Quarterly Samples**

Condition S4.B.2.c of the 2015 Permit and S4.B.3.a of the 2020 Permit require Local Manufacturing to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria but require the collection of a sample even if the criteria cannot be met. The facility has at least two distinct points of discharge off-site: one near the Contanda Gate and one in the ditch along Port Industrial Road. Local Manufacturing is currently only sampling from one location: Sample Point A, which is not a properly representative sample. During the March 4, 2020 Ecology inspection report, the inspector stated that Sample Point A was not representative of the industrially impacted stormwater discharging to the Chehalis River. Local Manufacturing agreed to move its sample

location to the end of the west ditch culver (Sample Point C) during the Ecology inspection, but never did. Local Manufacturing has violated these conditions each and every quarter during the last five years because it is not sampling each distinct point of discharge. These violations will continue until Local Manufacturing commences monitoring all distinct points of discharge.

**B. Failure to Analyze Quarterly Samples**

Condition S5.A, Condition S5.B, Table 2, and Table 3 of the Permits require Local Manufacturing to analyze stormwater samples collected quarterly for turbidity, copper, zinc, pH, oil sheen, COD, and TSS. Local Manufacturing violates these conditions by failing to analyze stormwater samples for each distinct point of discharge at each and every quarter for the last five years including at Sample Point A in the 3rd quarter of 2016 for turbidity and in the 2nd quarter of 2019 for oil sheen.

**C. Failure to Comply with Visual Monitoring Requirements**

Condition S7.A of the Permits requires that a monthly visual inspection be conducted at the facility by qualified personnel. Condition S7.B of the Permits requires each inspection to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged; observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges; observations for the presence of illicit discharges; a verification that the descriptions of potential pollutant sources required by the permit are accurate; a verification that the site map in the SWPPP reflects current conditions; and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed). Local Manufacturing has violated and continues to violate these requirements because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections each and every month.

Condition S7.C of the Permits requires that Local Manufacturing record the results of each inspection in an inspection report or checklist that is maintained on-site and documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection; the locations inspected; a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits; a summary report and schedule of implementation of the remedial actions Local Manufacturing plans to take if the site inspection indicates that the facility is out of compliance; the name, title, signature and certification of the person conducting the facility inspection; and a certification and signature of the responsible corporate officer or a duly authorized representative. Local Manufacturing is in violation of these requirements because, during the last five years, it failed to prepare and maintain the requisite inspection reports or checklists and failed to make the requisite certifications and summaries.

**D. Failure to Update Sampling Location**

Condition S4.B.2.d of the 2020 Permits requires that Local Manufacturing notify Ecology of any changes or updates to sample locations, discharge points and/or outfalls by submitting an “Industrial Stormwater General Permit Discharge/Sample Point Update Form” to Ecology. Local Manufacturing is in violation of this requirement because it never submitted the Sample Point Update form to Ecology after the March 4, 2020 Ecology inspection report stated that the current Sample Point A would be replaced by Sample Point C (end of the west ditch culvert).

Condition S4.B.4.e of the Permits requires that Local Manufacturing record the sample location (using SWPPP identifying number) for each stormwater sample taken. Local Manufacturing continues to violate this condition because it is listing the sample point on its DMRs at Sample Point A, but the sample location was moved to Sample Point C during the March 4, 2020 Ecology inspection report. In addition, Local Manufacturing submitted an Electronic Submission Cover Letter with an attestation agreed to at signing for each and every DMR for the last five years that states, “I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.” Local Manufacturing could be subject to significant criminal penalties for submitting false sample data for this sample point.

In the alternative, Local Manufacturing is in violation of Condition S4.B.1.d of the Permits, which requires that it obtain representative samples. Sample Point A is not representative of the industrially impacted stormwater discharging to the Chehalis River. Local Manufacturing still has not moved its sample location from Sample Point A to Sample Point C after agreeing to during the March 4, 2020 Ecology inspection.

**E. Failure to Comply with Sample Timing and Frequency**

Condition S4.B.1.a of the Permits requires that Local Manufacturing sample the discharge from each designated location at least once per quarter. Condition S4.B.1.b of the Permits requires that Local Manufacturing sample the stormwater discharge from the first fall storm even each year. “First fall storm event” means the first time on or after October 1st of each year that precipitation occurs and results in a stormwater discharge. Condition S4.B.1.c of the Permits requires that Local Manufacturing collect samples within the first 12 hours of stormwater discharge events. If it is not possible to collect a sample within the first 12 hours of a stormwater discharge event, the Permittee must collect the sample as soon as practicable after the first 12 hours, and keep documentation with the sampling records explaining why it could not collect samples within the first 12 hours or if it is unknown. Condition S4.B.1.d of the Permits requires Local Manufacturing to obtain representative samples. Precipitation data from the last five years is appended to this Notice of Intent to Sue and identifies these days.

Local Manufacturing is in violation of this requirement because in addition to sampling from the incorrect location, mentioned above in section III.A and C of this Notice of Intent to

Sue, it is also strategically taking samples on days with little to no rain so as to not trigger a benchmark exceedance. Local Manufacturing's samples are not representative of that facility as documented by observations, photographic evidence, and Ecology inspection reports, including:

- Dark brown/gray discharges leaving the site, documented by observations, photographic evidence, and pictures from the March 4, 2020 Ecology inspection report;
- A notice from Ecology that it was going to begin sampling stormwater at the same outfall at the site, as documented by the March 10, 2016 Ecology inspection report;
- A statement from Ecology inspector Adonia McKinzi that "[t]he facility's records in PARIS imply discharge of clear water. Site observations during the wet season and an empirical sample tested December 19, 2020 suggest the data submitted to the state was not representative," documented by the March 4, 2020 Ecology inspection report;
- A turbidity sampling result of 521.4 NTU taken by Ecology, as documented in the March 4, 2020 Ecology inspection report; and
- Independent samples taken at the facility on December 12, 2019 and November 17, 2020 indicated in Tables 2 and 3 below.

**Table 2: Independent Samples Taken Near the Contanda Gate**

Date on which sample was collected	Turbidity (Benchmark: 25 NTU)	Copper (Benchmark: 14 µg/L)	Zinc (Benchmark: 117 µg/L)	COD (Benchmark: 120 mg/L)	TSS (Benchmark: 100 mg/L)
December 12, 2019	371	36.8	52	209	155
November 17, 2020	549	36.1	82.1	--	--

**Table 3: Independent Samples Taken in the Ditch Along Port Industrial Road**

Date on which sample was collected	Turbidity (Benchmark: 25 NTU)	Copper (Benchmark: 14 µg/L)	Zinc (Benchmark: 117 µg/L)	COD (Benchmark: 120 mg/L)	TSS (Benchmark: 100 mg/L)
December 12, 2019	332	39.7	89.9	43.8	115
November 17, 2020	317	20.4	56.3	--	--

#### **F. Failure to Submit Corrected Information to Ecology**

Condition G20 of the Permits requires that when Local Manufacturing becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to Ecology, it shall promptly submit such facts or information. Local Manufacturing is in violation of this requirement because on June 10, 2019, Local Manufacturing submitted a Request for Coverage under the ISGP and incorrectly stated that the receiving water of Outfall A is Fry Creek. In the March 4, 2020 Ecology inspection report, Ecology informed Local Manufacturing that "PARIS was incorrect in the ditch flowing north and west to Fry Creek. The ditch flows south to the Chehalis River."

Local Manufacturing has continued to fail to submit the corrected permit application information to Ecology regarding the receiving water of the discharge from the facility.

#### **IV. CORRECTIVE ACTION VIOLATIONS**

##### **A. Violations of the Level One Requirements**

Condition S8.B of the Permits requires Local Manufacturing take specified actions, called a “Level One Corrective Action,” each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range. Condition S5.A, Condition S5.B, Table 2, and Table 3 of the Permits establish the following benchmarks: turbidity 25 NTU, total copper 14 µg/L, total zinc 117 µg/L, no visible oil sheen, pH 5–9 SU, COD 120 mg/L, and TSS 100 mg/L.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires that within 14 days of receipt of sampling results that indicate a benchmark exceedance during a given quarter; or, for parameters other than pH or visible oils sheen, the end of the quarter, whichever is later, Local Manufacturing: (1) conduct an inspection to investigate the cause; (2) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (3) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges; (4) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits; and (5) and sign, certify, and fully implement the revised SWPPP in accordance with Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Local Manufacturing is in violation of the Level One Corrective Action requirements in the Permits. It failed to implement Level One Corrective Action within 14 days of receipt or the end of the quarter for each and every benchmark exceedance including the exceedances on June 14, 2016 for turbidity; December 20, 2017 for turbidity; March 30, 2020 for turbidity; September 30, 2020 for copper; and a date known to Local Manufacturing in the 4th quarter of 2020 for turbidity. Local Manufacturing’s failures to comply with the Level One Corrective Action requirements include the failure to perform the required review, revision and certification of the SWPPP; perform required implementation of additional BMPs; and complete the required summarization in the Annual Report each and every time for the last five years, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range.

##### **B. Violations of the Level Two Requirements**

Condition S8.C of the Permits requires Local Manufacturing take specified actions, called a “Level Two Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Local Manufacturing: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges; (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits; and (4) sign, certify, and implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31<sup>st</sup> of the following year.

The Permits establish the benchmarks applicable to Local Manufacturing described in section IV.A of this Notice of Intent to Sue and Condition S5.A of the Permits.

Local Manufacturing has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action for discharge from its facility in accordance with Permits' conditions, including the required review, revision and certification of the SWPPP; the required implementation of additional BMPs, including additional structural source control BMPs; and the required summarization in the Annual Report each time since January 1, 2015, quarterly stormwater sampling results from the facility were greater than a benchmark or outside the benchmark range for any two quarters during a calendar year. Local Manufacturing has violated and continues to violate these requirements by failing to perform a Level Two Corrective Action for turbidity when a Level Two Corrective Action was triggered in the 4th quarter of 2020, as indicated by the benchmark exceedances in Table 1.

## **V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS**

Condition S9.B of the Permits requires Local Manufacturing to submit an accurate and complete Annual Report to Ecology no later than May 15th of each year. The Annual Report must include corrective action documentation as required in Condition S8.B–D of the Permits. If a corrective action is not yet completed at the time of submission of the Annual Report, Local Manufacturing must describe the status of any outstanding corrective action. Specific information to be included in the Annual Report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level One, Two, or Three Corrective Actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 Corrective Actions triggered during the previous calendar year, including identification of the date Local Manufacturing expects to complete corrective actions.

Local Manufacturing has violated this condition by failing to submit accurate and complete Annual Reports as required for the years 2015, 2016, 2017, 2018, and 2019. Local Manufacturing also failed to submit the 2020 Annual Report by the May 15, 2021 deadline.

## **VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS**

### **A. Failure to Record Information**

Condition S4.B of the Permits requires Local Manufacturing record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Local Manufacturing collected the sample within the first 12 hours of stormwater discharge event, an explanation of why Local Manufacturing could not collect a sample within the first 12 hours of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Local Manufacturing is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

### **B. Failure to Retain Records**

Condition S9.C of the 2015 Permit and S9.D of the 2020 Permit require Local Manufacturing to retain for a minimum of five years a copy of the current Permit, a copy of Local Manufacturing's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Local Manufacturing is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

## **VII. FAILURE TO REPORT PERMIT VIOLATIONS**

Condition S9.E of the 2015 Permit and Condition S9.F of the 2020 Permit require Local Manufacturing to take certain actions in the event it is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment or exceed any numeric effluent limitation in the permit. In such circumstances, Local Manufacturing must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Local Manufacturing must immediately notify the appropriate Ecology regional office of the failure to comply. Local Manufacturing must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Local Manufacturing became aware of the circumstances unless Ecology requests an earlier submission.

Local Manufacturing routinely violates these requirements, including each and every time it failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, each and every time Local Manufacturing discharged stormwater with concentrations of pollutants in excess of the Permits benchmarks, as described in Tables 1, 2, and 3 above. All these violations may endanger human health or the environment.

## **VIII. REQUEST FOR SWPPP**

Pursuant to Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, Twin Harbors Waterkeeper hereby requests that Local Manufacturing provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Local Manufacturing fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit and Condition S9.G of the 2020 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

## **IX. CONCLUSION**

The above-described violations reflect those indicated by the information currently available to Twin Harbors Waterkeeper. These violations are ongoing. Twin Harbors Waterkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to \$55,800 per day for each violation. In addition to civil penalties, Twin Harbors Waterkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Twin Harbors Waterkeeper believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Local Manufacturing under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Sincerely,

Smith & Lowney, PLLC

By: s/ Richard A. Smith  
Richard A. Smith  
Meredith Crafton  
Savannah Rose

cc: Michael Regan, Administrator, U.S. EPA  
Michelle Pirzadeh, Acting Region 10 Administrator, U.S. EPA  
Laura Watson, Director, Washington Department of Ecology  
Ingram, Zelasko & Goodwin Registered Agents, Inc. (120 E 1st St., Aberdeen, WA  
98520-5246)

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/1/16	0	1/29/16	0.93	2/26/16	0.34	3/25/16	0.16
1/2/16	0	1/30/16	0.32	2/27/16	0.05	3/26/16	0.18
1/3/16	0	1/31/16	0.23	2/28/16	0.61	3/27/16	0.17
1/4/16	0.03	2/1/16	0.11	2/29/16	0.32	3/28/16	0
1/5/16	0.12	2/2/16	0.04	3/1/16	2.17	3/29/16	0
1/6/16	0.08	2/3/16	0.62	3/2/16	0.75	3/30/16	0
1/7/16	0	2/4/16	0.16	3/3/16	0.13	3/31/16	0
1/8/16	0	2/5/16	0.45	3/4/16	0.44	4/1/16	0
1/9/16	0	2/6/16	0.08	3/5/16	0.71	4/2/16	0
1/10/16	0	2/7/16	0	3/6/16	0.6	4/3/16	0.45
1/11/16	0.25	2/8/16	0	3/7/16	0.43	4/4/16	0.08
1/12/16	1.33	2/9/16	0	3/8/16	0.29	4/5/16	0.07
1/13/16	0.2	2/10/16	0.06	3/9/16	2.53	4/6/16	0
1/14/16	0	2/11/16	0.73	3/10/16	0.03	4/7/16	0
1/15/16	0.34	2/12/16	0.42	3/11/16	0.31	4/8/16	0
1/16/16	0.75	2/13/16	1.09	3/12/16	0.83	4/9/16	0
1/17/16	0.55	2/14/16	0.75	3/13/16	0.72	4/10/16	0
1/18/16	0.45	2/15/16	0.6	3/14/16	0.53	4/11/16	0
1/19/16	0.36	2/16/16	0.19	3/15/16	0.2	4/12/16	0.52
1/20/16	0.92	2/17/16	0.21	3/16/16	0	4/13/16	0.35
1/21/16	3.97	2/18/16	0.35	3/17/16	0	4/14/16	0.14
1/22/16	0.35	2/19/16	0.56	3/18/16	0	4/15/16	0
1/23/16	0.18	2/20/16	0.01	3/19/16	0.01	4/16/16	0
1/24/16	0	2/21/16	0.14	3/20/16	0.22	4/17/16	0
1/25/16	0	2/22/16	0.33	3/21/16	0.76	4/18/16	0
1/26/16	0.71	2/23/16	0	3/22/16	0.04	4/19/16	0
1/27/16	1.4	2/24/16	0	3/23/16	0.84	4/20/16	0
1/28/16	0.83	2/25/16	0	3/24/16	0.2	4/21/16	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/22/16	0.33	5/20/16	0	6/17/16	0	7/15/16	0
4/23/16	0.39	5/21/16	0.02	6/18/16	0	7/16/16	0
4/24/16	0.31	5/22/16	0.15	6/19/16	0	7/17/16	0
4/25/16	0.01	5/23/16	0	6/20/16	0	7/18/16	0
4/26/16	0.01	5/24/16	0	6/21/16	0	7/19/16	0.01
4/27/16	0.02	5/25/16	0	6/22/16	0.07	7/20/16	0
4/28/16	0	5/26/16	0	6/23/16	0.14	7/21/16	0
4/29/16	0	5/27/16	0.08	6/24/16	0.01	7/22/16	0.01
4/30/16	0	5/28/16	0.48	6/25/16	0	7/23/16	0
5/1/16	0	5/29/16	0.01	6/26/16	0	7/24/16	0
5/2/16	0	5/30/16	0	6/27/16	0	7/25/16	0
5/3/16	0.02	5/31/16	0	6/28/16	0	7/26/16	0
5/4/16	0.01	6/1/16	0.1	6/29/16	0	7/27/16	0
5/5/16	0	6/2/16	0.12	6/30/16	0	7/28/16	0
5/6/16	0	6/3/16	0	7/1/16	0	7/29/16	0
5/7/16	0	6/4/16	0	7/2/16	0	7/30/16	0
5/8/16	0	6/5/16	0	7/3/16	0.02	7/31/16	0
5/9/16	0	6/6/16	0	7/4/16	0	8/1/16	0
5/10/16	0	6/7/16	0	7/5/16	0	8/2/16	0.03
5/11/16	0	6/8/16	0	7/6/16	0	8/3/16	0
5/12/16	0	6/9/16	0.23	7/7/16	0.15	8/4/16	0
5/13/16	0	6/10/16	0.24	7/8/16	0.04	8/5/16	0
5/14/16	0.06	6/11/16	0.04	7/9/16	0.1	8/6/16	0
5/15/16	0.01	6/12/16	0	7/10/16	0.03	8/7/16	0.16
5/16/16	0	6/13/16	0.09	7/11/16	0.01	8/8/16	0
5/17/16	0	6/14/16	0.09	7/12/16	0	8/9/16	0
5/18/16	0.02	6/15/16	0.01	7/13/16	0	8/10/16	0
5/19/16	0.25	6/16/16	0	7/14/16	0	8/11/16	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/12/16	0	9/9/16	0	10/7/16	0.04	11/4/16	0.13
8/13/16	0	9/10/16	0	10/8/16	1.13	11/5/16	2.01
8/14/16	0	9/11/16	0	10/9/16	0.22	11/6/16	0.16
8/15/16	0	9/12/16	0	10/10/16	0	11/7/16	0.12
8/16/16	0	9/13/16	0	10/11/16	0	11/8/16	0.11
8/17/16	0	9/14/16	0	10/12/16	0.39	11/9/16	0.44
8/18/16	0	9/15/16	0	10/13/16	2.5	11/10/16	0
8/19/16	0	9/16/16	0	10/14/16	0.93	11/11/16	0.11
8/20/16	0	9/17/16	0.85	10/15/16	2.11	11/12/16	0.26
8/21/16	0	9/18/16	0.01	10/16/16	0.51	11/13/16	0.65
8/22/16	0	9/19/16	0.12	10/17/16	0.5	11/14/16	0.23
8/23/16	0	9/20/16	0.05	10/18/16	0.08	11/15/16	0.63
8/24/16	0	9/21/16	0	10/19/16	0.55	11/16/16	0.5
8/25/16	0	9/22/16	0	10/20/16	1.6	11/17/16	0.84
8/26/16	0	9/23/16	0.37	10/21/16	0.26	11/18/16	0.07
8/27/16	0	9/24/16	0	10/22/16	0.26	11/19/16	0.45
8/28/16	0	9/25/16	0	10/23/16	0.08	11/20/16	0.94
8/29/16	0	9/26/16	0	10/24/16	0.12	11/21/16	0.26
8/30/16	0	9/27/16	0	10/25/16	0.08	11/22/16	1.1
8/31/16	0.41	9/28/16	0	10/26/16	0.61	11/23/16	0.89
9/1/16	0.86	9/29/16	0	10/27/16	0.17	11/24/16	2.56
9/2/16	0.1	9/30/16	0	10/28/16	0.09	11/25/16	0.34
9/3/16	0.09	10/1/16	0.54	10/29/16	0.28	11/26/16	1.12
9/4/16	0	10/2/16	0.06	10/30/16	0.3	11/27/16	0.42
9/5/16	0.53	10/3/16	0.04	10/31/16	0.7	11/28/16	0.54
9/6/16	0.22	10/4/16	0.5	11/1/16	0.14	11/29/16	0.15
9/7/16	0.03	10/5/16	0.49	11/2/16	0.64	11/30/16	0.11
9/8/16	0.01	10/6/16	0.71	11/3/16	0	12/1/16	0.15

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/2/16	0.45	12/30/16	0.02	1/27/17	0	2/24/17	0.21
12/3/16	0.49	12/31/16	0.43	1/28/17	0	2/25/17	0.22
12/4/16	0.33	1/1/17	0.06	1/29/17	0.09	2/26/17	0.4
12/5/16	0.54	1/2/17	0	1/30/17	0	2/27/17	0.13
12/6/16	0	1/3/17	0	1/31/17	0	2/28/17	0.08
12/7/16	0	1/4/17	0	2/1/17	0	3/1/17	0.06
12/8/16	0.05	1/5/17	0	2/2/17	0.02	3/2/17	0.65
12/9/16	0.63	1/6/17	0	2/3/17	0.35	3/3/17	0.63
12/10/16	0.54	1/7/17	0	2/4/17	0.73	3/4/17	0.31
12/11/16	0.64	1/8/17	0.65	2/5/17	0.35	3/5/17	0.82
12/12/16	0.51	1/9/17	0.05	2/6/17	0.37	3/6/17	0.3
12/13/16	0.1	1/10/17	0.1	2/7/17	0	3/7/17	1.01
12/14/16	0	1/11/17	0	2/8/17	1.16	3/8/17	0.32
12/15/16	0	1/12/17	0	2/9/17	0.98	3/9/17	1.23
12/16/16	0	1/13/17	0	2/10/17	0.32	3/10/17	0.05
12/17/16	0	1/14/17	0	2/11/17	0.02	3/11/17	0.56
12/18/16	0	1/15/17	0	2/12/17	0	3/12/17	0.05
12/19/16	1.55	1/16/17	0	2/13/17	0	3/13/17	1.3
12/20/16	0.12	1/17/17	1.44	2/14/17	0.38	3/14/17	1.2
12/21/16	0	1/18/17	1.37	2/15/17	1.15	3/15/17	0.28
12/22/16	0.55	1/19/17	1.12	2/16/17	0.09	3/16/17	0.15
12/23/16	0.52	1/20/17	0.04	2/17/17	0.01	3/17/17	1.84
12/24/16	0	1/21/17	0.04	2/18/17	0.07	3/18/17	0.48
12/25/16	0	1/22/17	0.13	2/19/17	0.44	3/19/17	0.01
12/26/16	0.92	1/23/17	0	2/20/17	0.2	3/20/17	0.07
12/27/16	0.64	1/24/17	0	2/21/17	0	3/21/17	0.19
12/28/16	0.02	1/25/17	0	2/22/17	0.02	3/22/17	0.43
12/29/16	0.57	1/26/17	0	2/23/17	0	3/23/17	0.34

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/24/17	0.41	4/21/17	0	5/19/17	0	6/16/17	0.04
3/25/17	0.14	4/22/17	0.35	5/20/17	0	6/17/17	0.04
3/26/17	0.55	4/23/17	0.57	5/21/17	0	6/18/17	0.01
3/27/17	0.29	4/24/17	0.17	5/22/17	0	6/19/17	0
3/28/17	1.14	4/25/17	0.16	5/23/17	0	6/20/17	0.02
3/29/17	1	4/26/17	0.17	5/24/17	0	6/21/17	0
3/30/17	0.13	4/27/17	0	5/25/17	0	6/22/17	0
3/31/17	0	4/28/17	0	5/26/17	0	6/23/17	0
4/1/17	0.13	4/29/17	0.4	5/27/17	0	6/24/17	0
4/2/17	0.02	4/30/17	0.05	5/28/17	0	6/25/17	0
4/3/17	0	5/1/17	0.15	5/29/17	0	6/26/17	0
4/4/17	0.49	5/2/17	0.32	5/30/17	0	6/27/17	0
4/5/17	0.71	5/3/17	0.15	5/31/17	0.04	6/28/17	0
4/6/17	0.27	5/4/17	0.09	6/1/17	0.05	6/29/17	0
4/7/17	0.71	5/5/17	0.2	6/2/17	0.11	6/30/17	0
4/8/17	0.13	5/6/17	0	6/3/17	0	7/1/17	0
4/9/17	0.07	5/7/17	0	6/4/17	0	7/2/17	0
4/10/17	0.43	5/8/17	0	6/5/17	0	7/3/17	0
4/11/17	0.14	5/9/17	0	6/6/17	0	7/4/17	0
4/12/17	0.49	5/10/17	0.08	6/7/17	0.03	7/5/17	0
4/13/17	0.31	5/11/17	0.86	6/8/17	0.33	7/6/17	0
4/14/17	0.38	5/12/17	0.61	6/9/17	0.24	7/7/17	0
4/15/17	0.02	5/13/17	0.06	6/10/17	0	7/8/17	0
4/16/17	0	5/14/17	0.18	6/11/17	0	7/9/17	0
4/17/17	0.61	5/15/17	0.7	6/12/17	0.03	7/10/17	0
4/18/17	0.44	5/16/17	0.41	6/13/17	0.11	7/11/17	0
4/19/17	0.28	5/17/17	0	6/14/17	0	7/12/17	0
4/20/17	0.44	5/18/17	0	6/15/17	0.98	7/13/17	0.02

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
7/14/17	0	8/11/17	0	9/8/17	0.02	10/6/17	0.18
7/15/17	0	8/12/17	0.18	9/9/17	0.05	10/7/17	0.05
7/16/17	0	8/13/17	0.08	9/10/17	0	10/8/17	0.06
7/17/17	0	8/14/17	0	9/11/17	0	10/9/17	0
7/18/17	0	8/15/17	0	9/12/17	0	10/10/17	0.12
7/19/17	0	8/16/17	0	9/13/17	0	10/11/17	0.21
7/20/17	0.08	8/17/17	0	9/14/17	0	10/12/17	0.18
7/21/17	0	8/18/17	0	9/15/17	0	10/13/17	0.01
7/22/17	0	8/19/17	0	9/16/17	0	10/14/17	0
7/23/17	0	8/20/17	0	9/17/17	0.29	10/15/17	0
7/24/17	0	8/21/17	0	9/18/17	0.12	10/16/17	0
7/25/17	0	8/22/17	0	9/19/17	0.65	10/17/17	0.48
7/26/17	0	8/23/17	0	9/20/17	0.81	10/18/17	2.12
7/27/17	0	8/24/17	0	9/21/17	0.01	10/19/17	0.58
7/28/17	0	8/25/17	0	9/22/17	0	10/20/17	0.36
7/29/17	0	8/26/17	0	9/23/17	0.01	10/21/17	2.63
7/30/17	0	8/27/17	0	9/24/17	0.01	10/22/17	0.15
7/31/17	0	8/28/17	0	9/25/17	0.21	10/23/17	0
8/1/17	0	8/29/17	0	9/26/17	0	10/24/17	0
8/2/17	0	8/30/17	0	9/27/17	0	10/25/17	0.17
8/3/17	0	8/31/17	0	9/28/17	0	10/26/17	0
8/4/17	0	9/1/17	0	9/29/17	0.23	10/27/17	0
8/5/17	0	9/2/17	0	9/30/17	0.13	10/28/17	0
8/6/17	0	9/3/17	0	10/1/17	0	10/29/17	0
8/7/17	0	9/4/17	0	10/2/17	0	10/30/17	0
8/8/17	0	9/5/17	0	10/3/17	0	10/31/17	0
8/9/17	0	9/6/17	0	10/4/17	0	11/1/17	0.12
8/10/17	0	9/7/17	0.09	10/5/17	0	11/2/17	0.39

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/3/17	0.13	12/1/17	0.76	12/29/17	1.4	1/26/18	0.46
11/4/17	0.43	12/2/17	0.82	12/30/17	0.22	1/27/18	0.33
11/5/17	0.13	12/3/17	0	12/31/17	0	1/28/18	0.14
11/6/17	0	12/4/17	0	1/1/18	0	1/29/18	1.16
11/7/17	0	12/5/17	0	1/2/18	0	1/30/18	0.12
11/8/17	0.5	12/6/17	0	1/3/18	0	1/31/18	0.55
11/9/17	0.16	12/7/17	0	1/4/18	0.37	2/1/18	0.97
11/10/17	0.01	12/8/17	0	1/5/18	0.51	2/2/18	0.36
11/11/17	0.55	12/9/17	0	1/6/18	0.01	2/3/18	0.22
11/12/17	1.88	12/10/17	0	1/7/18	0.69	2/4/18	0.55
11/13/17	1.76	12/11/17	0	1/8/18	0.08	2/5/18	0.04
11/14/17	1.62	12/12/17	0	1/9/18	0.08	2/6/18	0
11/15/17	0.8	12/13/17	0	1/10/18	0.35	2/7/18	0
11/16/17	0.31	12/14/17	0	1/11/18	1.93	2/8/18	0.04
11/17/17	0.24	12/15/17	0.05	1/12/18	0.1	2/9/18	0.01
11/18/17	0.02	12/16/17	0.12	1/13/18	0.26	2/10/18	0
11/19/17	1.2	12/17/17	0.49	1/14/18	0	2/11/18	0
11/20/17	0.45	12/18/17	0.47	1/15/18	0.02	2/12/18	0
11/21/17	1.87	12/19/17	1.6	1/16/18	0.03	2/13/18	0.3
11/22/17	0.67	12/20/17	0	1/17/18	0.68	2/14/18	0.21
11/23/17	0.67	12/21/17	0	1/18/18	0.66	2/15/18	0.19
11/24/17	0.18	12/22/17	0.12	1/19/18	0.64	2/16/18	0.37
11/25/17	0.32	12/23/17	0	1/20/18	0.27	2/17/18	0.95
11/26/17	1.08	12/24/17	0.21	1/21/18	0.76	2/18/18	0.08
11/27/17	0.02	12/25/17	0.01	1/22/18	0.17	2/19/18	0
11/28/17	0.61	12/26/17	0	1/23/18	1.72	2/20/18	0.09
11/29/17	0	12/27/17	0.01	1/24/18	0.47	2/21/18	0.01
11/30/17	0.35	12/28/17	1.54	1/25/18	0.37	2/22/18	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
2/23/18	0.25	3/23/18	0.31	4/20/18	0.13	5/18/18	0
2/24/18	0.12	3/24/18	0.01	4/21/18	0.12	5/19/18	0
2/25/18	0.34	3/25/18	0.03	4/22/18	0	5/20/18	0
2/26/18	0	3/26/18	0.56	4/23/18	0	5/21/18	0
2/27/18	0.18	3/27/18	0.9	4/24/18	0	5/22/18	0
2/28/18	0.65	3/28/18	0	4/25/18	0	5/23/18	0
3/1/18	0.09	3/29/18	0	4/26/18	0	5/24/18	0
3/2/18	0	3/30/18	0	4/27/18	0.16	5/25/18	0
3/3/18	0	3/31/18	0	4/28/18	0.13	5/26/18	0
3/4/18	0.11	4/1/18	0.31	4/29/18	0.13	5/27/18	0
3/5/18	0.03	4/2/18	0.08	4/30/18	0.01	5/28/18	0
3/6/18	0	4/3/18	0.04	5/1/18	0	5/29/18	0
3/7/18	0.07	4/4/18	0.53	5/2/18	0	5/30/18	0
3/8/18	0.69	4/5/18	0.88	5/3/18	0.01	5/31/18	0
3/9/18	0.04	4/6/18	0.07	5/4/18	0.01	6/1/18	0
3/10/18	0	4/7/18	1.08	5/5/18	0	6/2/18	0
3/11/18	0	4/8/18	0.59	5/6/18	0	6/3/18	0.28
3/12/18	0	4/9/18	0.05	5/7/18	0	6/4/18	0.09
3/13/18	0.09	4/10/18	0.32	5/8/18	0.05	6/5/18	0
3/14/18	0.08	4/11/18	0.69	5/9/18	0.08	6/6/18	0
3/15/18	0	4/12/18	0.43	5/10/18	0.17	6/7/18	0
3/16/18	0	4/13/18	1.76	5/11/18	0	6/8/18	0.52
3/17/18	0.07	4/14/18	1.61	5/12/18	0	6/9/18	0.14
3/18/18	0.05	4/15/18	0.39	5/13/18	0	6/10/18	0.26
3/19/18	0	4/16/18	0.62	5/14/18	0	6/11/18	0
3/20/18	0	4/17/18	0.01	5/15/18	0	6/12/18	0
3/21/18	0.19	4/18/18	0	5/16/18	0.03	6/13/18	0.33
3/22/18	0.48	4/19/18	0	5/17/18	0	6/14/18	0.05

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
6/15/18	0	7/13/18	0	8/10/18	0.01	9/7/18	0.1
6/16/18	0.03	7/14/18	0	8/11/18	0.07	9/8/18	0
6/17/18	0	7/15/18	0	8/12/18	0	9/9/18	0.13
6/18/18	0	7/16/18	0	8/13/18	0	9/10/18	0.06
6/19/18	0	7/17/18	0	8/14/18	0	9/11/18	0
6/20/18	0	7/18/18	0	8/15/18	0	9/12/18	0.12
6/21/18	0	7/19/18	0	8/16/18	0	9/13/18	0.03
6/22/18	0	7/20/18	0	8/17/18	0	9/14/18	0.14
6/23/18	0	7/21/18	0	8/18/18	0	9/15/18	0.57
6/24/18	0.06	7/22/18	0	8/19/18	0	9/16/18	0.52
6/25/18	0.02	7/23/18	0	8/20/18	0	9/17/18	0
6/26/18	0	7/24/18	0	8/21/18	0	9/18/18	0
6/27/18	0	7/25/18	0	8/22/18	0	9/19/18	0.01
6/28/18	0	7/26/18	0	8/23/18	0	9/20/18	0
6/29/18	0	7/27/18	0	8/24/18	0	9/21/18	0.06
6/30/18	0.14	7/28/18	0	8/25/18	0.02	9/22/18	0.15
7/1/18	0	7/29/18	0	8/26/18	0.05	9/23/18	0
7/2/18	0.01	7/30/18	0	8/27/18	0	9/24/18	0
7/3/18	0	7/31/18	0	8/28/18	0	9/25/18	0
7/4/18	0	8/1/18	0.02	8/29/18	0	9/26/18	0
7/5/18	0	8/2/18	0.04	8/30/18	0	9/27/18	0
7/6/18	0	8/3/18	0.02	8/31/18	0	9/28/18	0
7/7/18	0.05	8/4/18	0	9/1/18	0	9/29/18	0.23
7/8/18	0	8/5/18	0	9/2/18	0	9/30/18	0.03
7/9/18	0	8/6/18	0	9/3/18	0	10/1/18	0.57
7/10/18	0	8/7/18	0	9/4/18	0	10/2/18	0
7/11/18	0	8/8/18	0	9/5/18	0	10/3/18	0
7/12/18	0	8/9/18	0	9/6/18	0	10/4/18	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
10/5/18	0.62	11/2/18	0.21	11/30/18	0.79	12/28/18	1.7
10/6/18	0	11/3/18	0.75	12/1/18	0.15	12/29/18	1.22
10/7/18	0.52	11/4/18	0.49	12/2/18	0	12/30/18	0.06
10/8/18	0.06	11/5/18	0.33	12/3/18	0	12/31/18	0
10/9/18	0	11/6/18	0.02	12/4/18	0	1/1/19	0
10/10/18	0	11/7/18	0	12/5/18	0	1/2/19	0.01
10/11/18	0	11/8/18	0	12/6/18	0	1/3/19	1.32
10/12/18	0	11/9/18	0	12/7/18	0.04	1/4/19	0.26
10/13/18	0	11/10/18	0	12/8/18	0.01	1/5/19	0.22
10/14/18	0	11/11/18	0	12/9/18	0.46	1/6/19	0.76
10/15/18	0	11/12/18	0	12/10/18	0.1	1/7/19	0.07
10/16/18	0	11/13/18	0.01	12/11/18	1.91	1/8/19	0.33
10/17/18	0	11/14/18	0.08	12/12/18	0.85	1/9/19	0.41
10/18/18	0	11/15/18	0.01	12/13/18	1	1/10/19	0.03
10/19/18	0	11/16/18	0.04	12/14/18	0.27	1/11/19	0
10/20/18	0	11/17/18	0	12/15/18	0.05	1/12/19	0
10/21/18	0	11/18/18	0	12/16/18	1.11	1/13/19	0
10/22/18	0	11/19/18	0	12/17/18	0.95	1/14/19	0
10/23/18	0.04	11/20/18	0	12/18/18	0.37	1/15/19	0
10/24/18	0.07	11/21/18	0.67	12/19/18	0.03	1/16/19	0.2
10/25/18	1.38	11/22/18	0.75	12/20/18	0.45	1/17/19	0.36
10/26/18	0.22	11/23/18	0.31	12/21/18	0.1	1/18/19	1.55
10/27/18	1.45	11/24/18	0	12/22/18	0.54	1/19/19	0.19
10/28/18	0.32	11/25/18	0.1	12/23/18	0.35	1/20/19	0
10/29/18	0.35	11/26/18	2.52	12/24/18	0	1/21/19	0
10/30/18	0.64	11/27/18	0.28	12/25/18	0	1/22/19	1.36
10/31/18	0.46	11/28/18	0.34	12/26/18	0.61	1/23/19	0.12
11/1/18	0.32	11/29/18	0	12/27/18	0.09	1/24/19	0.03

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
1/25/19	0	2/22/19	0.65	3/22/19	0.09	4/19/19	0.07
1/26/19	0	2/23/19	0.36	3/23/19	0.01	4/20/19	0
1/27/19	0	2/24/19	0.03	3/24/19	0	4/21/19	0
1/28/19	0	2/25/19	0	3/25/19	0.35	4/22/19	0.42
1/29/19	0	2/26/19	0	3/26/19	0.02	4/23/19	0.1
1/30/19	0	2/27/19	0.02	3/27/19	0.12	4/24/19	0
1/31/19	0	2/28/19	0	3/28/19	0	4/25/19	0
2/1/19	0.65	3/1/19	0	3/29/19	0	4/26/19	0
2/2/19	0.04	3/2/19	0	3/30/19	0	4/27/19	0.01
2/3/19	0.05	3/3/19	0	3/31/19	0	4/28/19	0
2/4/19	0	3/4/19	0	4/1/19	0	4/29/19	0
2/5/19	0	3/5/19	0	4/2/19	0.04	4/30/19	0
2/6/19	0	3/6/19	0	4/3/19	0.13	5/1/19	0
2/7/19	0	3/7/19	0.55	4/4/19	0.02	5/2/19	0
2/8/19	0.3	3/8/19	0.15	4/5/19	0.33	5/3/19	0
2/9/19	0.04	3/9/19	0	4/6/19	0.52	5/4/19	0
2/10/19	0.21	3/10/19	0	4/7/19	0.11	5/5/19	0
2/11/19	1.11	3/11/19	0.48	4/8/19	0.24	5/6/19	0
2/12/19	0.23	3/12/19	0.16	4/9/19	0.02	5/7/19	0
2/13/19	0.11	3/13/19	0.01	4/10/19	0.52	5/8/19	0
2/14/19	0.39	3/14/19	0.02	4/11/19	0.38	5/9/19	0
2/15/19	0.27	3/15/19	0	4/12/19	0.04	5/10/19	0
2/16/19	0.05	3/16/19	0	4/13/19	0.41	5/11/19	0
2/17/19	0	3/17/19	0	4/14/19	0.18	5/12/19	0
2/18/19	0.01	3/18/19	0	4/15/19	0.13	5/13/19	0
2/19/19	0.5	3/19/19	0	4/16/19	0.27	5/14/19	0.21
2/20/19	0.05	3/20/19	0	4/17/19	0.05	5/15/19	0.21
2/21/19	0	3/21/19	0	4/18/19	0.29	5/16/19	0.32

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
5/17/19	0.05	6/14/19	0	7/12/19	0	8/9/19	0
5/18/19	0.05	6/15/19	0	7/13/19	0	8/10/19	0.03
5/19/19	0.2	6/16/19	0	7/14/19	0	8/11/19	0
5/20/19	0.1	6/17/19	0	7/15/19	0.08	8/12/19	0
5/21/19	0	6/18/19	0	7/16/19	0	8/13/19	0
5/22/19	0	6/19/19	0	7/17/19	0.11	8/14/19	0
5/23/19	0	6/20/19	0.01	7/18/19	0.01	8/15/19	0
5/24/19	0.01	6/21/19	0	7/19/19	0	8/16/19	0
5/25/19	0.04	6/22/19	0	7/20/19	0	8/17/19	0
5/26/19	0	6/23/19	0	7/21/19	0	8/18/19	0
5/27/19	0	6/24/19	0	7/22/19	0	8/19/19	0.02
5/28/19	0	6/25/19	0	7/23/19	0	8/20/19	0
5/29/19	0.01	6/26/19	0	7/24/19	0	8/21/19	0.19
5/30/19	0	6/27/19	0.09	7/25/19	0	8/22/19	0
5/31/19	0	6/28/19	0	7/26/19	0	8/23/19	0
6/1/19	0	6/29/19	0	7/27/19	0.02	8/24/19	0.02
6/2/19	0	6/30/19	0	7/28/19	0	8/25/19	0
6/3/19	0	7/1/19	0	7/29/19	0	8/26/19	0
6/4/19	0	7/2/19	0	7/30/19	0	8/27/19	0
6/5/19	0	7/3/19	0	7/31/19	0	8/28/19	0
6/6/19	0.16	7/4/19	0	8/1/19	0.01	8/29/19	0.03
6/7/19	0.48	7/5/19	0.02	8/2/19	0.06	8/30/19	0
6/8/19	0	7/6/19	0.08	8/3/19	0	8/31/19	0.01
6/9/19	0	7/7/19	0.03	8/4/19	0	9/1/19	0
6/10/19	0	7/8/19	0.06	8/5/19	0	9/2/19	0
6/11/19	0	7/9/19	0.4	8/6/19	0	9/3/19	0
6/12/19	0	7/10/19	0.35	8/7/19	0	9/4/19	0
6/13/19	0	7/11/19	0.04	8/8/19	0.01	9/5/19	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
9/6/19	0	10/4/19	0.1	11/1/19	0	11/29/19	0
9/7/19	0	10/5/19	0	11/2/19	0	11/30/19	0
9/8/19	0.3	10/6/19	0	11/3/19	0	12/1/19	0.14
9/9/19	0.78	10/7/19	0.27	11/4/19	0	12/2/19	0
9/10/19	0	10/8/19	0.1	11/5/19	0	12/3/19	0
9/11/19	0	10/9/19	0	11/6/19	0	12/4/19	0.09
9/12/19	1.02	10/10/19	0	11/7/19	0	12/5/19	0
9/13/19	0.01	10/11/19	0	11/8/19	0	12/6/19	0.29
9/14/19	0.43	10/12/19	0	11/9/19	0.5	12/7/19	0.46
9/15/19	0.34	10/13/19	0	11/10/19	0	12/8/19	0
9/16/19	0.14	10/14/19	0	11/11/19	0	12/9/19	0
9/17/19	0.45	10/15/19	0.11	11/12/19	0.44	12/10/19	0.22
9/18/19	0	10/16/19	1.07	11/13/19	0	12/11/19	0.71
9/19/19	0.01	10/17/19	0.39	11/14/19	0	12/12/19	0.34
9/20/19	0	10/18/19	0.52	11/15/19	0.44	12/13/19	0.35
9/21/19	0	10/19/19	0.69	11/16/19	0.04	12/14/19	0.06
9/22/19	0.46	10/20/19	0.32	11/17/19	0.92	12/15/19	0
9/23/19	0.15	10/21/19	1.18	11/18/19	0.72	12/16/19	0.13
9/24/19	0.02	10/22/19	0.01	11/19/19	0	12/17/19	0
9/25/19	0	10/23/19	0	11/20/19	0	12/18/19	0.48
9/26/19	0.16	10/24/19	0	11/21/19	0	12/19/19	1.74
9/27/19	0.19	10/25/19	0.03	11/22/19	0	12/20/19	2.35
9/28/19	0	10/26/19	0	11/23/19	0.22	12/21/19	0.19
9/29/19	0	10/27/19	0	11/24/19	0.08	12/22/19	0
9/30/19	0	10/28/19	0	11/25/19	0.06	12/23/19	0.03
10/1/19	0	10/29/19	0	11/26/19	0.04	12/24/19	0.28
10/2/19	0.07	10/30/19	0	11/27/19	0	12/25/19	0.05
10/3/19	0.26	10/31/19	0	11/28/19	0	12/26/19	0.14

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
12/27/19	0.08	1/24/20	0.4	2/21/20	0	3/20/20	0
12/28/19	0.04	1/25/20	0.38	2/22/20	0.13	3/21/20	0
12/29/19	0.17	1/26/20	0.45	2/23/20	0.36	3/22/20	0
12/30/19	0.01	1/27/20	1.43	2/24/20	0	3/23/20	0.33
12/31/19	1.74	1/28/20	0.45	2/25/20	0	3/24/20	0.39
1/1/20	0.13	1/29/20	1.16	2/26/20	0	3/25/20	0
1/2/20	0.62	1/30/20	1.02	2/27/20	0	3/26/20	0.01
1/3/20	0.72	1/31/20	0.98	2/28/20	0.28	3/27/20	0.39
1/4/20	0.21	2/1/20	0.79	2/29/20	0.22	3/28/20	0.59
1/5/20	0.38	2/2/20	0.3	3/1/20	0	3/29/20	0.34
1/6/20	2.57	2/3/20	0.01	3/2/20	0.48	3/30/20	0.36
1/7/20	0.48	2/4/20	1.08	3/3/20	0.29	3/31/20	0.35
1/8/20	0.09	2/5/20	0.85	3/4/20	0.01	4/1/20	0.18
1/9/20	0.01	2/6/20	1.16	3/5/20	0.56	4/2/20	0.11
1/10/20	1.39	2/7/20	0.52	3/6/20	0.01	4/3/20	0
1/11/20	0.48	2/8/20	0.08	3/7/20	0.14	4/4/20	0
1/12/20	0.38	2/9/20	0	3/8/20	0	4/5/20	0
1/13/20	0.14	2/10/20	0	3/9/20	0	4/6/20	0
1/14/20	0.15	2/11/20	0.05	3/10/20	0.12	4/7/20	0
1/15/20	0.18	2/12/20	0	3/11/20	0.04	4/8/20	0
1/16/20	0.05	2/13/20	0.19	3/12/20	0	4/9/20	0
1/17/20	0.07	2/14/20	0.25	3/13/20	0.07	4/10/20	0
1/18/20	0.6	2/15/20	0.55	3/14/20	0	4/11/20	0
1/19/20	0.01	2/16/20	0.25	3/15/20	0	4/12/20	0
1/20/20	0.08	2/17/20	0.07	3/16/20	0	4/13/20	0
1/21/20	0.95	2/18/20	0	3/17/20	0	4/14/20	0.01
1/22/20	2.56	2/19/20	0	3/18/20	0	4/15/20	0.02
1/23/20	1.39	2/20/20	0	3/19/20	0	4/16/20	0

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
4/17/20	0	5/15/20	0	6/12/20	0.42	7/10/20	0
4/18/20	0.01	5/16/20	0.53	6/13/20	0.24	7/11/20	0.08
4/19/20	0	5/17/20	0.03	6/14/20	0.11	7/12/20	0.01
4/20/20	0	5/18/20	0	6/15/20	0.58	7/13/20	0
4/21/20	0	5/19/20	0.02	6/16/20	0.11	7/14/20	0
4/22/20	0.45	5/20/20	0.08	6/17/20	0	7/15/20	0
4/23/20	0.01	5/21/20	0.24	6/18/20	0	7/16/20	0
4/24/20	0.18	5/22/20	0	6/19/20	0.01	7/17/20	0
4/25/20	0.53	5/23/20	0	6/20/20	0.08	7/18/20	0
4/26/20	0.3	5/24/20	0	6/21/20	0	7/19/20	0
4/27/20	0.13	5/25/20	0.27	6/22/20	0	7/20/20	0
4/28/20	0	5/26/20	0	6/23/20	0	7/21/20	0
4/29/20	0.09	5/27/20	0	6/24/20	0.03	7/22/20	0
4/30/20	0.1	5/28/20	0	6/25/20	0	7/23/20	0
5/1/20	0.01	5/29/20	0	6/26/20	0	7/24/20	0
5/2/20	0.49	5/30/20	0.08	6/27/20	0.01	7/25/20	0
5/3/20	0.05	5/31/20	0.01	6/28/20	0	7/26/20	0
5/4/20	0.02	6/1/20	0	6/29/20	0	7/27/20	0
5/5/20	0.1	6/2/20	0	6/30/20	0.03	7/28/20	0
5/6/20	0.24	6/3/20	0	7/1/20	0.25	7/29/20	0
5/7/20	0	6/4/20	0	7/2/20	0	7/30/20	0
5/8/20	0	6/5/20	0	7/3/20	0.01	7/31/20	0
5/9/20	0	6/6/20	0.32	7/4/20	0	8/1/20	0
5/10/20	0	6/7/20	0	7/5/20	0	8/2/20	0
5/11/20	0.03	6/8/20	0.19	7/6/20	0.03	8/3/20	0.16
5/12/20	0.47	6/9/20	1.15	7/7/20	0.07	8/4/20	0
5/13/20	0.12	6/10/20	0.02	7/8/20	0	8/5/20	0
5/14/20	0.11	6/11/20	0	7/9/20	0.05	8/6/20	0.12

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
8/7/20	0	9/4/20	0	10/2/20	0	10/30/20	0.24
8/8/20	0.03	9/5/20	0	10/3/20	0	10/31/20	0
8/9/20	0	9/6/20	0	10/4/20	0	11/1/20	0
8/10/20	0	9/7/20	0	10/5/20	0	11/2/20	0
8/11/20	0	9/8/20	0	10/6/20	0	11/3/20	0.49
8/12/20	0	9/9/20	0	10/7/20	0	11/4/20	0.72
8/13/20	0	9/10/20	0	10/8/20	0.03	11/5/20	0.34
8/14/20	0	9/11/20	0	10/9/20	0.72	11/6/20	0
8/15/20	0	9/12/20	0	10/10/20	0.86	11/7/20	0
8/16/20	0	9/13/20	0	10/11/20	0.84	11/8/20	0
8/17/20	0	9/14/20	0.18	10/12/20	0.05	11/9/20	0.11
8/18/20	0	9/15/20	0.31	10/13/20	0.46	11/10/20	0.21
8/19/20	0.01	9/16/20	0.04	10/14/20	0.05	11/11/20	0.03
8/20/20	0.31	9/17/20	0	10/15/20	0	11/12/20	1.06
8/21/20	0.34	9/18/20	0.07	10/16/20	0.24	11/13/20	1.16
8/22/20	0	9/19/20	0.54	10/17/20	0.01	11/14/20	0.83
8/23/20	0	9/20/20	0	10/18/20	0.38	11/15/20	0.17
8/24/20	0	9/21/20	0.02	10/19/20	0.02	11/16/20	1.28
8/25/20	0	9/22/20	0	10/20/20	0.03	11/17/20	1.11
8/26/20	0	9/23/20	1.32	10/21/20	0.07	11/18/20	0.92
8/27/20	0	9/24/20	0.02	10/22/20	0	11/19/20	0.18
8/28/20	0	9/25/20	0.85	10/23/20	0.82	11/20/20	1.24
8/29/20	0	9/26/20	0.43	10/24/20	0	11/21/20	0.03
8/30/20	0.03	9/27/20	0	10/25/20	0	11/22/20	0.12
8/31/20	0.01	9/28/20	0	10/26/20	0	11/23/20	0.08
9/1/20	0	9/29/20	0	10/27/20	0	11/24/20	0.66
9/2/20	0	9/30/20	0	10/28/20	0.01	11/25/20	0.17
9/3/20	0	10/1/20	0	10/29/20	0	11/26/20	0.03

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
11/27/20	0.09	12/25/20	0.47	1/22/21	0	2/19/21	0.16
11/28/20	0.03	12/26/20	0.28	1/23/21	0	2/20/21	0.27
11/29/20	0	12/27/20	0.3	1/24/21	0.51	2/21/21	0.95
11/30/20	0.54	12/28/20	0	1/25/21	0.47	2/22/21	1.35
12/1/20	0	12/29/20	0.49	1/26/21	0.35	2/23/21	0.35
12/2/20	0	12/30/20	0.91	1/27/21	0.16	2/24/21	0
12/3/20	0	12/31/20	0.41	1/28/21	0.05	2/25/21	0.61
12/4/20	0	1/1/21	0.99	1/29/21	0.06	2/26/21	0.31
12/5/20	0.03	1/2/21	2.72	1/30/21	0.4	2/27/21	0.02
12/6/20	0.09	1/3/21	0.63	1/31/21	2.24	2/28/21	0.07
12/7/20	0.11	1/4/21	1.77	2/1/21	1.29	3/1/21	0
12/8/20	0.65	1/5/21	1.52	2/2/21	1.05	3/2/21	0
12/9/20	0.03	1/6/21	0.05	2/3/21	0.12	3/3/21	0
12/10/20	0.57	1/7/21	0	2/4/21	0.21	3/4/21	0.96
12/11/20	1.14	1/8/21	0.22	2/5/21	0.23	3/5/21	0.61
12/12/20	0.09	1/9/21	0.16	2/6/21	0.13	3/6/21	0.06
12/13/20	0.42	1/10/21	0.14	2/7/21	0.09	3/7/21	0.63
12/14/20	0.04	1/11/21	2.32	2/8/21	0	3/8/21	0.02
12/15/20	0.17	1/12/21	1.89	2/9/21	0	3/9/21	0.04
12/16/20	0.65	1/13/21	0.04	2/10/21	0	3/10/21	0
12/17/20	0.32	1/14/21	0.23	2/11/21	0.17	3/11/21	0
12/18/20	0.54	1/15/21	0.06	2/12/21		3/12/21	0
12/19/20	1.2	1/16/21	0.07	2/13/21		3/13/21	0
12/20/20	0.19	1/17/21	0.15	2/14/21	0.3	3/14/21	0.3
12/21/20	1.32	1/18/21	0	2/15/21	0.65	3/15/21	0.03
12/22/20	0	1/19/21	0	2/16/21	0.18	3/16/21	0
12/23/20	0	1/20/21	0.02	2/17/21	0	3/17/21	0
12/24/20	0	1/21/21	0.05	2/18/21	0.24	3/18/21	0.18

## Precipitation Data for Hoquiam Bowerman Airport, WA US - Station ID USW00094225

Date	Inches	Date	Inches	Date	Inches	Date	Inches
3/19/21	0.62	4/16/21	0	5/14/21	0	6/11/21	0.19
3/20/21	0.14	4/17/21	0	5/15/21	0	6/12/21	0.42
3/21/21	0.87	4/18/21	0	5/16/21	0	6/13/21	0.5
3/22/21	0.02	4/19/21	0	5/17/21	0.07	6/14/21	0
3/23/21	0	4/20/21	0	5/18/21	0.07	6/15/21	0.16
3/24/21	0.51	4/21/21	0	5/19/21	0.01	6/16/21	0
3/25/21	0.02	4/22/21	0	5/20/21	0	6/17/21	0
3/26/21	0	4/23/21	0	5/21/21	0	6/18/21	0
3/27/21	0	4/24/21	0.77	5/22/21	0	6/19/21	0
3/28/21	0.73	4/25/21	0.17	5/23/21	0.01	6/20/21	0
3/29/21	0.01	4/26/21	0.02	5/24/21	0.33	6/21/21	0
3/30/21	0	4/27/21	0	5/25/21	0	6/22/21	0
3/31/21	0	4/28/21	0	5/26/21	0.01	6/23/21	0.01
4/1/21	0	4/29/21	0	5/27/21	0.4	6/24/21	0
4/2/21	0	4/30/21	0.18	5/28/21	0.02	6/25/21	0
4/3/21	0	5/1/21	0	5/29/21	0	6/26/21	0
4/4/21	0	5/2/21	0	5/30/21	0	6/27/21	0
4/5/21	0	5/3/21	0.34	5/31/21	0		
4/6/21	0	5/4/21	0	6/1/21	0		
4/7/21	0.17	5/5/21	0	6/2/21	0		
4/8/21	0.06	5/6/21	0.07	6/3/21	0		
4/9/21	0.09	5/7/21	0.11	6/4/21	0.07		
4/10/21	0.11	5/8/21	0.03	6/5/21	0.2		
4/11/21	0	5/9/21	0.05	6/6/21	1.09		
4/12/21	0	5/10/21	0	6/7/21	0.01		
4/13/21	0	5/11/21	0	6/8/21	0		
4/14/21	0	5/12/21	0	6/9/21	0.13		
4/15/21	0	5/13/21	0	6/10/21	0.15		